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JANI-KING OF CALIFORNIA, INC., JANI-KING, INC.,  
and JANI-KING INTERNATIONAL, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

CESAR GARCIA, an individual, )  
 )  
Plaintiff, )  
v. )  
 )  
JANI-KING OF CALIFORNIA, INC., a Texas )  
corporation; JANI-KING, INC., a Texas )  
corporation; JANI-KING INTERNATIONAL, )  
INC., a Texas corporation; and DOES 1 through )  
100, inclusive, )  
 )  
Defendants. )  
 )  
 )  
 )  
 )

No. 3-10-CV-05477 RS  
**PARTIES' STIPULATION FOR  
FILING OF PLAINTIFF'S FIRST  
AMENDED COMPLAINT;  
[PROPOSED] ORDER**

**STIPULATION**

IT IS HEREBY STIPULATED by Plaintiff Cesar Garcia ("Plaintiff") and Defendants Jani-King of California, Inc., Jani-King, Inc. and Jani-King International, Inc. ("Defendants"), through their counsel, as follows:

- 1) Plaintiff wishes to file a First Amended Complaint;
- 2) All parties have reviewed Plaintiff's proposed First Amended Complaint, a copy of which is attached hereto as Exhibit 1 with all proposed new allegations set forth in bold;
- 3) Plaintiff contends that the proposed amendment is necessary and proper to allow him to recover all damages he suffered related to the subject matter in a single lawsuit;
- 4) Defendants hereby agree to the filing of Plaintiff's First Amended Complaint in this action; and
- 5) All parties agree that Defendants will have until April 15, 2011 to file an Answer or Rule 12(b) motion in response to Plaintiff's First Amended Complaint.

Date: March 28, 2011

**THE LAW OFFICES OF DANIEL FEDER**

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/s/  
DANIEL L. FEDER  
Attorney for Plaintiff  
CESAR GARCIA

Date: March 28, 2011

**BARTKO, ZANKEL, TARRANT & MILLER**  
**FAEGRE & BENSON, LLP**

\_\_\_\_\_  
/s/  
BENJAMIN RILEY  
Attorneys for Defendants JANI-KING OF  
CALIFORNIA, INC., JANI-KING, INC.,  
and JANI-KING INTERNATIONAL, INC.

**[PROPOSED] ORDER**

BASED ON THE FOREGOING, Plaintiff is authorized to file his First Amended Complaint, and Defendants shall file their response to the First Amended Complaint on or before April 15, 2011.

**IT IS SO ORDERED.**

Date: March 28, 2011



Richard Seeborg  
United States District Judge